

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

DEPUTY CLERK



UNITED STATES OF AMERICA

v.

BO JACK KELLEY

**5 - 20 CR 0054 - H**  
No. \_\_\_\_\_

INDICTMENT

The Grand Jury Charges:

Count One

Production of Child Pornography  
(Violation of 18 U.S.C. § 2251(a))

From in or about June 2019, to in or about February 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Bo Jack Kelley**, defendant, did use, persuade, induce, and entice, and attempt to do so, "Jane Doe," a person under the age of eighteen (18) years, to engage in sexually explicit conduct, that is: lascivious exhibition of the genitals and pubic area of said minor, for the purpose of producing a visual depiction of such conduct, and which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

Count Two  
Receipt of Child Pornography  
(Violation of 18 U.S.C. § 2252(a)(2) and (b))

From in or about June 2019, to in or about February 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Bo Jack Kelley**, defendant, did knowingly receive any visual depiction, that had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

Count Three  
Distribution of Child Pornography  
(Violation of 18 U.S.C. § 2252(a)(2) and (b))

From in or about June 2019, to in or about February 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Bo Jack Kelley**, defendant, did knowingly distribute any visual depiction, that had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

Count Four  
Cyber Stalking  
(Violation of 18 U.S.C. § 2261A(2))

From in or about June 2019, to in or about February 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Bo Jack Kelley**, defendant, with intent to injure, harass, and intimidate “Jane Doe,” used an interactive computer service, an electronic communication service, an electronic communication service of interstate commerce, and facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Doe.

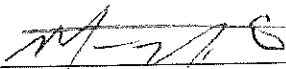
In violation of Title 18, United States Code, Section 2261A(2).

Count Five  
Transfer of Obscene Material to a Minor  
(Violation of 18 U.S.C. § 1470)

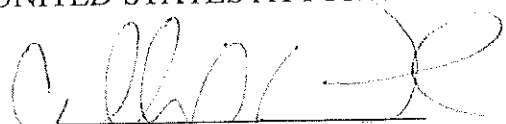
From in or about June 2019, to in or about February 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Bo Jack Kelley**, defendant, knowingly used a facility and means of interstate and foreign commerce, and transferred, and attempted to transfer, to another individual who had not attained the age of sixteen years, obscene matter, that is: Defendant sent one digital image file depicting an adult male engaged in lascivious exhibition of the genitals and pubic area of the adult male to a person Defendant knew and believed to be a minor female who had not attained the age of sixteen years.

In violation of Title 18, United States Code, Section 1470.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

ERIN NEALY COX  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
CALLIE WOOLAM  
Assistant United States Attorney  
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1205 Texas Avenue, Suite 700  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

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THE UNITED STATES OF AMERICA

v.

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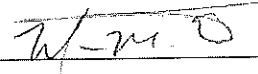
INDICTMENT

- COUNT 1: PRODUCTION OF CHILD PORNOGRAPHY  
Title 18, United States Code, Section 2251(a).
- COUNT 2: RECEIPT OF CHILD PORNOGRAPHY  
Title 18, United States Code, Sections 2252(a)(2) and (b).
- COUNT 3: DISTRIBUTION OF CHILD PORNOGRAPHY  
Title 18, United States Code, Sections 2252(a)(2) and (b).
- COUNT 4: CYBER STALKING  
Title 18, United States Code, Section 2261A(2).
- COUNT 5: TRANSFER OF OBSCENE MATERIAL TO A MINOR  
Title 18, United States Code, Section 1470.

(5 COUNTS)

A true bill rendered,

Lubbock



Foreperson

Filed in open court this 13th day of May, A.D. 2020

Clerk

ARREST WARRANT TO ISSUE



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UNITED STATES MAGISTRATE JUDGE